

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

HEIDI WOEBBEKING,
*individually and on behalf of those
similarly situated,*

Plaintiff,

V.

SHARI'S MANAGEMENT
CORPORATION; GATHER HOLDINGS
GUARANTEE, LLC,

Defendants.

Case No. 1:24-cv-01871-CL

MOTION FOR ENTRY OF DEFAULT

Plaintiff moves the Court to direct the Clerk to enter Defendants' default in this case under Federal Rule of Civil Procedure 55(a). *See Hunter v. Dutch Gold Res., Inc.*, No. 1:11-cv-01450-CL, 2012 WL 1279474, at *1 (D. Or. Apr. 13, 2012) ("Rule 55 requires a two-step process consisting of: (1) seeking a clerk's entry of default, and (2) filing a motion for the entry of default judgment." (internal quotation marks omitted)). Defendants have failed to plead and otherwise defend in response to Plaintiff's suit, *see* Fed. R. Civ. P. 55(a), as set forth in the declaration of counsel attached to this motion as Exhibit A. Undersigned counsel certifies that, because no Defendant has appeared in this case nor provided any notice of intent to appear, the conference demanded by Local Rule 7-1(a)(1) before filing this motion has not been possible. *See* L.R. 55-1.

Dated: January 30, 2025

Respectfully submitted,

/s/ Nathan R. Ring, Esq.

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* *Pro Hac Vice* applications to be submitted

*Counsel for Plaintiff and the Proposed
Class*